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January 31, 2025

MEMO ENDORSED

BY ECF & EMAIL

Hon. Laura Taylor Swain
Chief District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. John Gass, 24 Cr. 523 (LTS)

Dear Chief Judge Swain:

In lieu of appearing at today's scheduled conference, the Defense submits this letter on behalf of both parties. The parties respectfully request that the Court set the following motion schedule:

- Government Opposition to the pending Defense *Bruen* Motion: February 21, 2025
- Any Defense Reply: February 28, 2025

The parties request that the status conference be continued to March 21, 2025.

The Defense expects a pre-trial disposition in this matter and plea discussions have been ongoing since undersigned counsel's entrance in the matter. The Defense consents to the exclusion of time from today to the next status conference pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Defense agrees that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial, as the proposed exclusion will allow the Government time to respond to the pending motion and the parties an opportunity to continue discussions of a pre-trial resolution of this case.

Respectfully submitted,

/s/ Mitchell Schwartz
Mitchell E. Schwartz
Assistant Federal Defender
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The foregoing requests are granted. The Government's opposition to the pending motion to dismiss is due by **February 21, 2025**, and any Defense reply is due by **February 28, 2025**. The pretrial conference scheduled for January 31, 2025, at 11:30 a.m. is hereby adjourned to **March 21, 2025, at 12:00 p.m.** The Court finds pursuant to 18 USC section 3161(h)(7)(A) that the ends of justice served by an exclusion of the time from speedy trial computations from today's date through March 21, 2025, outweigh the best interests of the public and the defendant in a speedy trial for the reasons stated herein. DE 20 resolved.

SO ORDERED.

1/31/2025

/s/ Laura Taylor Swain, Chief USDJ